

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHEVRON CORPORATION,

Plaintiff,

v.

STEVEN DONZIGER, et al.,

Defendants.

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X

11 Civ. 0691 (LAK)

**DECLARATION OF ANNE CHAMPION IN SUPPORT OF CHEVRON
CORPORATION'S MOTION TO COMPEL DONZIGER TO EXECUTE AN
UNQUALIFIED TRANSFER OF AMAZONIA SHARES AND A TRANSFER AND
ASSIGNMENT OF JUDGMENT INTERESTS**

I, ANNE CHAMPION, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and before this Court. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, and I am counsel for Chevron Corporation ("Chevron") in the above-captioned matter. I am personally familiar with the facts set forth herein, unless the context indicates otherwise. I make this declaration in support of Chevron's Motion to Compel Steven Donziger, The Law Offices of Steven R. Donziger and Donziger Associates, PLLC (collectively, "Donziger") to Execute an Unqualified Transfer and Assignment of Amazonia Shares and a Transfer and Assignment of Judgment Interests.

2. On June 16, 2018, counsel for Chevron a delivered a letter to Donziger to request that he execute an attached transfer document for the Amazonia shares, without any alteration or addition. A true and correct copy of Chevron's request is attached as **Exhibit 1**. A separate

copy of the Share Transfer Form that Chevron asked Donziger to execute is attached as **Exhibit 2**.

3. On June 22, 2018, Donziger declined Chevron's request. A true and correct copy of Donziger's refusal is included in **Exhibit 1**.

4. On June 25, 2018, Chevron presented Donziger at his deposition with a document titled "Transfer and Assignment of Judgment Interests" (true and correct copy attached as **Exhibit 3**) that would irrevocably assign, set over and transfer to Chevron any and all of Donziger's interests in the February 14, 2011 Lago Agrio judgment, as modified.

5. Donziger refused to execute the Transfer and Assignment of Judgment Interests at his deposition. A true and correct copy of an excerpt from the deposition of Steven Donziger documenting his refusal to execute is included in **Exhibit 4** (pp. 231:3–20).

6. Following Donziger's deposition on June 25, I emailed him to again ask him to execute the Transfer and Assignment of Judgment Interests. A true and correct copy of my email to Donziger is attached as **Exhibit 5**.

7. Donziger did not execute the form as requested, and emailed me to state he would not provide any discovery in advance of the contempt hearing scheduled for Thursday, June 28. A true and correct copy of Donziger's June 27, 2018 email refusing to produce documents and failing to respond to my request that he execute the form is attached as **Exhibit 6**.

8. During his June 25, 2018 deposition, Donziger admitted that he previously assigned portions of his 6.3% interest in recovery from the Lago Agrio Judgment to various individuals. A true and correct copy of an excerpt from the deposition of Steven Donziger documenting his assignment is included in **Exhibit 4** (pp. 144:6–145:22).

9. During his June 25, 2018 deposition, Donziger admitted to raising funds since entry of the Court's March 4, 2014 Judgment but refused to testify how much money he has

obtained. A true and correct copy of an excerpt from the deposition of Steven Donziger documenting this admission is included in **Exhibit 4** (pp. 120:8–121:5).

Executed on this 27th day of June, 2018 at New York, New York.

/s/ Anne Champion

Anne Champion